

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**LONGFIN CORP. and
VENKATA S. MEENAVALLI,**

Defendants.

Case No.: 19-cv-5296-DLC

**Declaration of Catherine E. Pappas
Under Local Rule 6.1(d)**

I, Catherine E. Pappas, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am a member in good standing of the bars of the State of New Jersey and the Commonwealth of Pennsylvania and appear in this case *pro hac vice* (ECF No. 51). I am employed by Plaintiff Securities and Exchange Commission (the “SEC”) as a Senior Adviser. I make this declaration pursuant to Local Rule 6.1(d) to show that good and sufficient reason exists to issue an Order to Show Cause in connection with the approval of the SEC’s proposal (the “SEC’s Proposal”) to establish a Fair Fund pursuant to Section 308(a) of the Sarbanes-Oxley Act of 2002 for all collections in this matter, and to combine those collections with the Fair Fund established in the related action, *SEC v. Longfin, et al.*, 18-cv-2977-DLC (the “Related Action”), for distribution in accordance with the distribution plan approved by this Court in that action.
2. No previous application for the relief requested herein or any similar relief has been made.
3. The SEC seeks an order to show cause to provide to harmed investors the opportunity to object to the SEC’s Proposal insofar as a small group of investors potentially harmed by the

conduct in the captioned action may not be eligible to file claims under the plan approved in the Related Action. The SEC does not know the identity of those investors and has no practical means by which to directly inform potentially harmed investors of its application to the Court to approve the SEC's Proposal. The SEC believes the best alternative to individual notice in this situation is the entry of the proposed Order to Show Cause, by which potentially harmed investors will have the opportunity to communicate objections, if any, to the SEC's Proposal.

4. If the Court grants the Motion and enters the proposed Order to Show Cause, upon the completion of the steps set forth in the Order to Show Cause, the SEC will file a notice with the Court, so notifying the Court and responding to any objections; and provide to the Court a proposed Order approving the SEC's Proposal or an amended proposal, as appropriate.

I declare, under penalty of perjury that the foregoing is true and correct.

Executed on: August 13, 2020

s/Catherine E. Pappas
Catherine E. Pappas

CERTIFICATE OF SERVICE

I, Catherine E. Pappas, hereby certify that, on August 13, 2020, I caused the foregoing motion and accompanying documents to be electronically filed with the clerk of the court for the U.S. District Court of Southern District of New York, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

In addition, I will send the foregoing filing by UPS to (i) Legalinc Corporate Services, Inc., 651 North Broad Street, Suite 206, Middletown, DE 19709 (Longfin’s registered agent); and (ii) McManimon, Scotland & Baumann, LLC, 75 Livingston Avenue, Suite 201, Roseland, NJ 07068, Attn: Michele M. Dudas (Longfin’s Assignee for the Benefit of Creditors in Monmouth County, New Jersey).

s/ Catherine E. Pappas
Catherine E. Pappas
Counsel for Plaintiff